

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

JUL 17 2012

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA) DOCKET NO. 3:12cr228
)
v.) **BILL OF INDICTMENT**
)
) Violations:
(1) TONY HUMPHREY) 18 U.S.C. § 1951
) 18 U.S.C. § 924(c)
(2) COREY MILLER) 18 U.S.C. § 2113(a)
) 18 U.S.C. § 2113(d)
(3) SADIQ WHITE) 18 U.S.C. § 2
) 21 U.S.C. § 841
(4) ADONTE YOUNG)
)
)

THE GRAND JURY CHARGES:

At all times material to this Bill of Indictment, the following businesses were engaged in commercial activities within the Western District of North Carolina, and elsewhere, all of which said activities were in and affected interstate commerce:

1. Regional Finance Corporation of North Carolina d/b/a Regional Finance of Charlotte #2 located at 5210 N. Tryon Street Unit B, Charlotte, Mecklenburg County, North Carolina is a subsidiary of Regional Management Corp., a diversified specialty consumer finance company which provides monetary loans to customers in several states and is engaged in business which is in and affecting interstate commerce.
2. Boom #8, L.L.C d/b/a Sonic Drive-in located at 7820 Forest Point Boulevard, Charlotte, Mecklenburg County, North Carolina receives inventory of merchandise from outside of North Carolina and is engaged in business which is in and affecting interstate commerce.
3. Automotive Management Services, Inc. d/b/a Crown Auto Sales and Finance located at 5923 Orr Road, Charlotte, Mecklenburg County, North Carolina receives inventory and merchandise from outside of North Carolina and is engaged in business that is in and affecting interstate commerce.
4. Regional Finance Corporation of North Carolina d/b/a Regional Finance of Charlotte #1 located at 4401 E. Independence Boulevard, Charlotte, Mecklenburg County, North Carolina is a subsidiary of Regional Management Corp., a diversified specialty consumer finance company which provides monetary loans to customers in several states and is engaged in business which is in and affecting interstate commerce.

APRIL 3, 2012 ROBBERY OF REGIONAL FINANCE OF CHARLOTTE #2

COUNT ONE

(Hobbs Act Robbery – Interference with Commerce by Threats or Violence)

On or about April 3, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) TONY HUMPHREY

did knowingly and unlawfully, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, in that he took the personal property of Regional Finance Corporation of North Carolina d/b/a Regional Finance of Charlotte #2 located at 5210 N. Tryon Street Unit B, Charlotte, Mecklenburg County, North Carolina, that is, United States currency from the person and in the presence of persons, against their will and by means of actual and threatened force, violence, and fear of immediate and future injury, in violation of Title 18, United States Code, Section 1951.

COUNT TWO

(Possession of a Firearm in Furtherance of a Crime of Violence-Hobbs Act Robbery)

On or about April 3, 2012, in Mecklenburg County, in the Western District of North Carolina, and elsewhere, defendant

(1) TONY HUMPHREY

during and in relation to a crime of violence, that is, Obstruct, Delay and Affect Commerce and the Movement of Articles and Commodities in Commerce, by Robbery, a violation of Title 18, United States Code, Section 1951(a), as charged in Count One of this Indictment, did knowingly and unlawfully use and carry a firearm in furtherance of such crime of violence and did possess and brandish said firearm, in violation of Title 18, United States Code, Section 924(c).

APRIL 6, 2012 ATTEMPTED ROBBERY OF SONIC RESTAURANT

COUNT THREE

(Hobbs Act Robbery – Attempt to Interfere with Commerce by Threats or Violence)

On or about April 6, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants

**(1) TONY HUMPHREY and
(2) COREY MILLER**

aided and abetted by each other and others known and unknown, did knowingly and unlawfully,

attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, in that they attempted to take the personal property of Boom #8, L.L.C d/b/a Sonic Drive-in located at 7820 Forest Point Boulevard, Charlotte, Mecklenburg County, North Carolina, that is, United States currency from the person and in the presence of persons, against their will and by means of actual and threatened force, violence, and fear of immediate and future injury, in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT FOUR

(Possession of a Firearm in Furtherance of a Crime of Violence-Attempted Hobbs Act Robbery)

On or about April 6, 2012, in Mecklenburg County, in the Western District of North Carolina, defendants,

**(1) TONY HUMPHREY and
(2) COREY MILLER**

aided and abetted by each other and others known and unknown, during and in relation to a crime of violence, that is, Attempt to Obstruct, Delay and Affect Commerce and the Movement of Articles and Commodities in Commerce, by Robbery, a violation of Title 18, United States Code, Section 1951(a), as charged in Count Three of this Indictment, did knowingly and unlawfully use and carry a firearm in furtherance of such crime of violence and did possess and brandish said firearm, in violation of Title 18, United States Code, Sections 924(c) and 2.

APRIL 13, 2012 PNC BANK ROBBERY

COUNT FIVE

(Robbery of PNC Bank)

On or about April 13, 2012 in Mecklenburg County, within the Western District of North Carolina, defendants,

**(1) TONY HUMPHREY,
(3) SADIQ WHITE and
(4) ADONTE YOUNG**

aided and abetted by each other and others known and unknown, by force, violence, and intimidation did knowingly take from the person and presence of another person or persons, a sum of money belonging to and in the care, custody, control, management, and possession of PNC Bank, located at 1000 East Boulevard, Charlotte, North Carolina, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT SIX
(Robbery of PNC Bank)

On or about April 13, 2012 in Mecklenburg County, within the Western District of North Carolina, defendants,

**(1) TONY HUMPHREY,
(3) SADIQ WHITE and
(4) ADONTE YOUNG**

aided and abetted by each other and others known and unknown, by force, violence, and intimidation did knowingly take from the person and presence of another person or persons, a sum of money belonging to and in the care, custody, control, management, and possession of PNC Bank, located at 1000 East Boulevard, Charlotte, North Carolina, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), and 2.

COUNT SEVEN
(Possession of a Firearm in Furtherance of a Crime of Violence-Bank Robbery)

On or about April 13, 2012 in Mecklenburg County, within the Western District of North Carolina, defendants,

**(1) TONY HUMPHREY,
(3) SADIQ WHITE and
(4) ADONTE YOUNG**

aided and abetted by each other and others known and unknown, during and in relation to a crime of violence, that is, bank robbery, a violation of Title 18, United States Code, Section 2113 (a) and (d), as charged in Counts Five and Six, for which the defendants could be prosecuted in a court of the United States, did knowingly, and unlawfully use and carry a firearm, and in furtherance of such crime of violence, did possess and discharge said firearm in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

APRIL 14, 2012 CROWN AUTO SALES ATTEMPTED ROBBERY

COUNT EIGHT
(Hobbs Act Robbery – Attempt to Interfere with Commerce by Threats or Violence)

On or about April 14, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants

**(1) TONY HUMPHREY and
(2) COREY MILLER**

aided and abetted by each other and others known and unknown, did knowingly and unlawfully, attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, in that they attempted to take the personal property Automotive Management Services, Inc. d/b/a Crown Auto Sales and Finance located at 5923 Orr Road, Charlotte, Mecklenburg County, North Carolina, that is, United States currency from the person and in the presence of persons, against their will and by means of actual and threatened force, violence, and fear of immediate and future injury, in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT NINE

(Possession of a Firearm in Furtherance of a Crime of Violence-Attempted Hobbs Act Robbery)

On or about April 14, 2012, in Mecklenburg County, in the Western District of North Carolina, defendants,

**(1) TONY HUMPHREY and
(2) COREY MILLER**

aided and abetted by each other and others known and unknown, during and in relation to a crime of violence, that is, Attempt to Obstruct, Delay and Affect Commerce and the Movement of Articles and Commodities in Commerce, by Robbery, a violation of Title 18, United States Code, Section 1951(a), as charged in Count Eight of this Indictment, did knowingly and unlawfully use and carry a firearm in furtherance of such crime of violence and did possess and brandish said firearm, in violation of Title 18, United States Code, Sections 924(c) and 2.

APRIL 16, 2012 REGIONAL FINANCE CORPORATION ROBBERY

COUNT TEN

(Hobbs Act Robbery – Interference with Commerce by Threats or Violence)

On or about April 16, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) TONY HUMPHREY

did knowingly and unlawfully, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, in that he took the personal property of Regional Finance Corporation of North Carolina d/b/a Regional Finance of Charlotte #1 located at 4401 E. Independence Boulevard, Charlotte, Mecklenburg County, that is, United States currency from the person and in the presence of persons, against their will and by means of actual and threatened force, violence, and fear of immediate and future injury, in violation of Title 18, United States Code, Section 1951.

COUNT ELEVEN

(Possession of a Firearm in Furtherance of a Crime of Violence-Hobbs Act Robbery)

On or about April 16, 2012, in Mecklenburg County, in the Western District of North Carolina, and elsewhere, defendant

(1) TONY HUMPHREY

during and in relation to a crime of violence, that is, Obstruct, Delay and Affect Commerce and the Movement of Articles and Commodities in Commerce, by Robbery, a violation of Title 18, United States Code, Section 1951(a), as charged in Count Ten of this Indictment, did knowingly and unlawfully use and carry a firearm in furtherance of such crime of violence and did possess and brandish said firearm, in violation of Title 18, United States Code, Section 924(c).

SADIQ WHITE POSSESS WITH INTENT TO DISTRIBUTE CRACK AND POWDER COCAINE

COUNT TWELVE

(December 22, 2011 Possess With Intent to Distribute Crack Cocaine)

On or about December 22, 2011, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

3) SADIQ WHITE

did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine base, commonly called "crack cocaine," a Schedule II controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(February 28, 2012 Possess With Intent to Distribute Crack Cocaine)

On or about February 28, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

3) SADIQ WHITE

did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine base, commonly called "crack cocaine," a Schedule II controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(February 28, 2012 Possess With Intent to Distribute Powder Cocaine)

On or about February 28, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

3) SADIQ WHITE

did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine a Schedule II controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

TONY HUMPHREY POSSESS WITH INTENT TO DISTRIBUTE CRACK COCAINE AND MARIJUANA

COUNT FIFTEEN

(Possess With Intent to Distribute Crack Cocaine)

On or about April 18, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

1) TONY HUMPHREY

did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine base, commonly called "crack cocaine," a Schedule II controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Possess With Intent to Distribute Marijuana)

On or about April 18, 2012, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

1) TONY HUMPHREY

did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. §§ 924 and 982, 21 U.S.C. §853, 28 U.S.C. § 2461, and the statutes incorporated therein. The defendants have or had a possessory or legal interest in property, to include but not be limited to the following, which is subject to forfeiture in accordance with the foregoing statutes:

- (a) all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the violations alleged in this bill of indictment;
- (b) all property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations;
- (c) all property involved in such violations; and
- (d) in the event that any property described in (a), (b), or (c) cannot be located or recovered or has been substantially diminished in value or has been commingled with other property which cannot be divided without difficulty, all other property of the defendants, to the extent of the value of the property described in (a), (b), or (c).

The Grand Jury finds probable cause to believe that the aforementioned property is subject to forfeiture on one or more of the grounds stated above. Said property includes but is not limited to the following:

- .38 caliber Taurus handgun and ammunition collected during the course of the investigation.
- Approximately \$1,201.00 seized from Sadiq White on December 22, 2011.
- Approximately \$5,216.00 seized from Sadiq White on February 28, 2012.

A TRUE BILL:

ANNE M. TOMPKINS
UNITED STATES ATTORNEY


ELIZABETH F. GREENE
SPECIAL ASSISTANT UNITED STATES ATTORNEY

